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9 Las Vegas, Nevada 89118  
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12 Attorneys for Third Party Defendant  
13 RND ENTERPRISES, INC.

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 RENEE HOWARD, individually and as  
11 parent of IH, a minor, wrongful death  
12 heirs of the deceased, TIMOTHY  
13 HOWARD,

14 Plaintiffs,

15 vs.

16 T-BROTHERS LOGISTICS, L.L.C., a South  
17 Dakota corporation; T-BROTHERS  
18 TRUCKING, L.L.C., a South Dakota  
19 corporation; RUSH TRUCK CENTERS OF  
20 NEVADA, INC., a Delaware Corporation,

Defendants.

T-BROTHERS LOGISTICS, L.L.C., a South  
Dakota corporation; T-BROTHERS  
TRUCKING, L.L.C., a South Dakota  
corporation,

Third Party Plaintiffs,

vs.

RND ENTERPRISES, INC., a South  
Dakota corporation,

Third Party Defendant.

Case No. 2:23-cv-01570-JAD-DJA

STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES (FIRST  
REQUEST)

1                   **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**

2                   Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel  
 3 of record, hereby stipulate and request that this Court extend discovery in the above-  
 4 captioned case by one hundred twenty (120) days. In addition, the parties request that all  
 5 other future deadlines contemplated by the Discovery Plan and Scheduling Order be  
 6 extended pursuant to Local Rule. In support of this Stipulation and Order, the parties state  
 7 as follows:

- 8                   1.       On October 11, 2023, Plaintiff filed her Complaint in the United States District  
                     Court, District of Nevada.
- 9                   2.       On November 27, 2023, Defendant/Third Party Plaintiff T-Brothers Trucking,  
                     L.L.C. filed its Answer and Third Party Complaint.
- 10                  3.       On November 28, 2023, Defendant Rush Truck Centers of Nevada, Inc. filed  
                     its Answer.
- 11                  4.       On January 5, 2024, Plaintiff served Initial FRCP 26 Disclosures.
- 12                  5.       On January 9, 2024, Defendants/Third Party Plaintiffs T-Brothers Logistics,  
                     L.L.C. and T-Brothers Trucking L.L.C. served their Initial FRCP 26  
                     Disclosures.
- 13                  6.       On January 17, 2024, Defendant Rush Truck Centers of Nevada, Inc. served  
                     its Initial FRCP 26.1 Disclosures.
- 14                  7.       On January 24, 2024, the Court entered the Discovery Plan and Scheduling  
                     Order.
- 15                  8.       On February 28, 2024, Plaintiff propounded written discovery requests on  
                     Rush Truck Centers of Nevada, Inc., T-Brothers Logistics, L.L.C., and T-  
                     Brothers Trucking, L.L.C, each individually.
- 16                  9.       On April 2, 2024, Plaintiff served her First Supplement to Initial Disclosures.
- 17                  10.       On April 19, 2024, Plaintiff served her Second Supplement to Initial  
                     Disclosures.
- 18                  11.       On May 1, 2024, Third-Party Defendant RND Enterprises, Inc. filed its

1                   Answer to Defendants/Third Party Plaintiffs T-Brothers Logistics, L.L.C. and  
2                   T-Brothers Trucking L.L.C.'s Third Party Complaint.

3                   **DISCOVERY REMAINING**

4                   1. Third-Party Defendant RND Enterprises, Inc. will serve written discovery.  
5                   2. Defendants/Third-Party Plaintiffs T-Brothers Logistics, L.L.C. and T-  
6                   Brothers Trucking L.L.C will serve written discovery.  
7                   3. Defendant Rush Truck Centers of Nevada, Inc. will serve written discovery.  
8                   4. All parties will respond to written discovery that has been propounded upon  
9                   them.  
10                  5. The Defendants will take the deposition of Plaintiff Rene Howard.  
11                  6. Plaintiff may depose the Defendants'/Third-Party Defendant's Rule 30(b)(6)  
12                  designee(s).  
13                  7. Defendants will collect any and all relevant medical and/or mental health  
14                  records and/or billing related to the allegations contained in Plaintiff's  
15                  Complaint.  
16                  8. Defendants/Third Party Defendant may depose Plaintiff's medical and/or  
17                  mental health providers once able to collect any and all relevant medical  
18                  and/or mental health records and billing.  
19                  9. The parties may depose any and all other witnesses identified through  
20                  discovery.

21                  **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

22                  The parties aver, pursuant to Local Rule 26-3, that good cause exists for the  
23 requested extension. This Request for an extension of time is not sought for to delay the  
24 proceedings or for any improper purpose.

25                  Third-Party Defendant RND Enterprises, Inc. recently entered into this litigation,  
26 filing its Answer on May 1, 2024. At the time, Third-Party Defendant entered this case,  
27 expert disclosures were due in just over 2 months. Due to the severity of the subject  
28 incident, the materials and plethora of information and documents involved with this matter,

1 and the timing of all named parties making their appearance in this matter, it is necessary  
2 for an extension of the discovery deadlines in order to allow each party a fair and just  
3 opportunity to obtain the information, analyze the information, and obtain experts as may  
4 be necessary in order to properly prosecute or defend this matter.

5 For those reasons, the parties respectfully request an extension of the discovery  
6 deadlines in this matter.

7 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3  
8 governs modifications or extension of the Discovery Plan and Scheduling Order. Any  
9 stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must  
10 be made no later than twenty-one (21) days before the expiration of the subject deadline  
11 and must comply fully with LR 26-3.

12 This is the first request for extension of time in this matter. The parties respectfully  
13 submit that the reasons set forth above constitute compelling reasons and good cause for  
14 the extension.

15 The following is a list of the current discovery deadlines and the parties' proposed  
16 extended deadlines:

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Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>September 3, 2024</i>	<i>Thursday, January 2, 2025</i>
Deadline to Amend Pleadings or Add Parties	<i>June 5, 2024</i>	<i>Thursday, October 3, 2024</i>
Expert Disclosure pursuant to FRCP26 (a)(2)	<i>July 5, 2024</i>	<i>Monday, November 4, 2024</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>August 5, 2024</i>	<i>Tuesday, December 3, 2024</i>
Dispositive Motions	<i>October 3, 2024</i>	<i>Friday, January 31, 2025</i>
Joint Pretrial Order	<i>November 4, 2024</i>	<i>Tuesday, March 4, 2025</i>  <i>If dispositive motions are pending, the parties will submit their Joint Pretrial Order within thirty (30) days of the Court's order as to any dispositive motions.</i>

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WHEREFORE, the parties respectfully request this Court extend the discovery period by one hundred twenty (120) days from the current deadline of September 3, 2024 up to and including January 2, 2025, and extend the other dates as outlined in accordance with the table above.

IT IS SO STIPULATED.

6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	DATED the 28th day of May, 2024.  <b>SCHUETZE, McGAHA, TURNER &amp; FERRIS PLLC</b>
<i>/s/ William W. McGaha</i> <hr/> WILLIAM W. McGAHA, ESQ. Nevada Bar No. 3234 601 S. Rancho Drive, Suite C-20 Las Vegas, Nevada 89106 <i>Attorney for Plaintiff</i>	<i>/s/ Josh Cole Aicklen</i> <hr/> JOSH COLE AICKLEN Nevada Bar No.: 7254 NATHANIEL T. COLLINS Nevada Bar No.: 15027 6385 S. Rainbow Blvd., Ste. 600 Las Vegas, Nevada 89118 Attorneys for Third Party Defendant RND ENTERPRISES, INC.
14 15 16 17 18 19 20 21	DATED the 28th day of May, 2024.  <b>HALL JAFFE, LLP</b>
<i>/s/ Kevin S. Smith</i> <hr/> STEVEN T. JAFFE, ESQ. Nevada Bar No. 7035 KEVIN S. SMITH, ESQ. Nevada Bar No. 7184 7425 Peak Drive Las Vegas, Nevada 89128 <i>Attorney for Defendants/Third Party Plaintiffs T-Brothers Logistics, L.L.C. and T-Brothers Trucking, L.L.C.</i>	DATED the 28th day of May, 2024.  <b>HAWKINS PARNELL &amp; YOUNG, LLP</b>

## ORDER

IT IS SO ORDERED.

Dated this 29th day of May, 2024.

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

**Sims, Tina**

---

**To:** Collins, Nathaniel  
**Subject:** RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

---

**From:** Freeman, Eric <[efreeman@hpylaw.com](mailto:efreeman@hpylaw.com)>

**Sent:** Sunday, May 26, 2024 1:44 PM

**To:** Collins, Nathaniel <[Nathaniel.Collins@lewisbrisbois.com](mailto:Nathaniel.Collins@lewisbrisbois.com)>

**Subject:** [EXT] RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Yes, you can add my e-signature.

**Eric O. Freeman, Partner**  
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**From:** Collins, Nathaniel <[Nathaniel.Collins@lewisbrisbois.com](mailto:Nathaniel.Collins@lewisbrisbois.com)>  
**Sent:** Wednesday, May 22, 2024 10:27 AM  
**To:** Kevin Smith <[ksmith@halljaffe.com](mailto:ksmith@halljaffe.com)>; Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)>; Freeman, Eric <[efreeman@hpylaw.com](mailto:efreeman@hpylaw.com)>; Steve Jaffe <[sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com)>; Donna Brand <[dbrand@smlvlaw.net](mailto:dbrand@smlvlaw.net)>; Kyle Allison <[kallison@halljaffe.com](mailto:kallison@halljaffe.com)>; Marianne Sylva <[msylva@halljaffe.com](mailto:msylva@halljaffe.com)>; Lori-Anne Harrison <[LHarrison@halljaffe.com](mailto:LHarrison@halljaffe.com)>  
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**Subject:** RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Mr. Freeman, were you able to review the SAO? If so do you approve and provide authority to affix your e-signature?

Thank you.



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**Sent:** Monday, May 20, 2024 3:53 PM

**To:** Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)>; Collins, Nathaniel <[Nathaniel.Collins@lewisbrisbois.com](mailto:Nathaniel.Collins@lewisbrisbois.com)>; Freeman, Eric <[efreeman@hpylaw.com](mailto:efreeman@hpylaw.com)>; Steve Jaffe <[sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com)>; Donna Brand <[dbrand@smlvlaw.net](mailto:dbrand@smlvlaw.net)>; Kyle Allison <[Kallison@halljaffe.com](mailto:Kallison@halljaffe.com)>; Marianne Sylva <[msylva@halljaffe.com](mailto:msylva@halljaffe.com)>; Lori-Anne Harrison <[LHarrison@halljaffe.com](mailto:LHarrison@halljaffe.com)>

**Cc:** Aicklen, Josh Cole <[Josh.Aicklen@lewisbrisbois.com](mailto:Josh.Aicklen@lewisbrisbois.com)>; Plata, Jackie <[Jackie.Plata@lewisbrisbois.com](mailto:Jackie.Plata@lewisbrisbois.com)>; Ramos, Georgina <[Georgina.Ramos@lewisbrisbois.com](mailto:Georgina.Ramos@lewisbrisbois.com)>; Sims, Tina <[Tina.Sims@lewisbrisbois.com](mailto:Tina.Sims@lewisbrisbois.com)>; Donna Brand <[dbrand@smlvlaw.net](mailto:dbrand@smlvlaw.net)>; Jeremi Fajardo <[jfajardo@smlvlaw.net](mailto:jfajardo@smlvlaw.net)>

**Subject:** [EXT] RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Nathaniel:

This is fine with us as well. You can sign electronically for me on behalf of T Brothers Trucking and T Brothers Logistics.

Thanks.

**Kevin S. Smith, Esq.**

Attorney



HALL | JAFFE

ATTORNEYS AT LAW

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Las Vegas, NV 89128

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Email: [ksmith@halljaffe.com](mailto:ksmith@halljaffe.com)

**\*\* Please note that as of July 1, 2023 my email will be changing from [ksmith@lawhjc.com](mailto:ksmith@lawhjc.com) to [ksmith@halljaffe.com](mailto:ksmith@halljaffe.com), please update your records\*\***

---

**From:** Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)>

**Sent:** Monday, May 20, 2024 1:13 PM

**To:** Collins, Nathaniel <[Nathaniel.Collins@lewisbrisbois.com](mailto:Nathaniel.Collins@lewisbrisbois.com)>; Freeman, Eric <[efreeman@hpylaw.com](mailto:efreeman@hpylaw.com)>; Steve Jaffe <[sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com)>

<[sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com)>; Kevin Smith <[ksmith@halljaffe.com](mailto:ksmith@halljaffe.com)>; Donna Brand <[dbrand@smlvlaw.net](mailto:dbrand@smlvlaw.net)>; Kyle Allison <[kallison@halljaffe.com](mailto:kallison@halljaffe.com)>

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**Subject:** RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Nathaniel:

I have reviewed the SAO and approve. Please affix my electronic signature.

Kindest Regards,

William W. McGaha, Esq.

**Legalride, L.L.C.**

**Schuetze, McGaha, Turner & Ferris, P.L.L.C.**

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**Sent:** Monday, May 20, 2024 11:20 AM

**To:** Freeman, Eric <[efreeman@hpylaw.com](mailto:efreeman@hpylaw.com)>; Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)>; [sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com); [ksmith@halljaffe.com](mailto:ksmith@halljaffe.com); Donna Brand <[dbrand@smlvlaw.net](mailto:dbrand@smlvlaw.net)>; Kyle Allison <[kallison@halljaffe.com](mailto:kallison@halljaffe.com)>

**Cc:** Aicklen, Josh Cole <[Josh.Aicklen@lewisbrisbois.com](mailto:Josh.Aicklen@lewisbrisbois.com)>; Plata, Jackie <[Jackie.Plata@lewisbrisbois.com](mailto:Jackie.Plata@lewisbrisbois.com)>; Ramos, Georgina <[Georgina.Ramos@lewisbrisbois.com](mailto:Georgina.Ramos@lewisbrisbois.com)>; Sims, Tina <[Tina.Sims@lewisbrisbois.com](mailto:Tina.Sims@lewisbrisbois.com)>

**Subject:** RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Hello Counsel,

Please see the attached Stipulation and Order to Extend the Discovery Deadlines 120 days. Please advise if you have any changes to be made or if you authorize your e-signature to be attached.

Thank you.



**Nathaniel T. Collins**  
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**Subject:** [EXT] RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Rush Truck Center will stipulate as well.

**Eric O. Freeman**, Partner  
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**From:** Collins, Nathaniel <[Nathaniel.Collins@lewisbrisbois.com](mailto:Nathaniel.Collins@lewisbrisbois.com)>  
**Sent:** Wednesday, May 8, 2024 11:20 AM  
**To:** Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)>; [sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com); [ksmith@halljaffe.com](mailto:ksmith@halljaffe.com); Freeman, Eric <[efreeman@hpylaw.com](mailto:efreeman@hpylaw.com)>; Donna Brand <[dbrand@smlvlaw.net](mailto:dbrand@smlvlaw.net)>  
**Cc:** Aicklen, Josh Cole <[Josh.Aicklen@lewisbrisbois.com](mailto:Josh.Aicklen@lewisbrisbois.com)>; Plata, Jackie <[Jackie.Plata@lewisbrisbois.com](mailto:Jackie.Plata@lewisbrisbois.com)>; Ramos, Georgina <[Georgina.Ramos@lewisbrisbois.com](mailto:Georgina.Ramos@lewisbrisbois.com)>; Sims, Tina <[Tina.Sims@lewisbrisbois.com](mailto:Tina.Sims@lewisbrisbois.com)>  
**Subject:** RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Thank you, Bill for your response.

Is Hall Jaffe amenable? If so, I will send out an SAO for approval.

Thank you.



**Nathaniel T. Collins**  
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**From:** Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)>  
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**Subject:** [EXT] Re: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

---

Yes, of course. Bill McGaha

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**Subject:** RE: Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Hello Counsel,

As you all know, our client has recently entered this litigation. It is our understanding that discovery deadlines are rapidly approaching, with an initial expert disclosure deadline of July 5, 2024. This matter requires more

time than what is currently provided under the current Discovery Order to properly perform discovery. As such, would you be willing to stipulate to a 120-day extension to discovery to allow us reasonable time to participate in discovery in an attempt to avoid prejudice to our client?

Thank you.



**Nathaniel T. Collins**  
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**Subject:** Renee Howard v. T-Brothers Logistics, L.L.C., et al. // Case No.: 2:23-cv-01570-JAD-DJA - Request for Prior Pleadings and Discovery

Dear Counsel,

Attached please find a Request for Prior Pleadings and Discovery regarding the above-referenced case. Thank you.

**Tina Sims**  
Legal Secretary  
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